

COGR Committee Reports & Hot Topics

June 6, 2025



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Transition Impact Survey, Part II: Preliminary Results

June 6, 2025



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Speakers:



Cindy Hope, Director, Costing & Financial Compliance, COGR



Krystal Toups, Director, Contracts and Grants Administration, COGR



Kris West, Director, Research Ethics & Compliance, COGR

Transition

Impact

Survey, Part II:

Preliminary

Results

June 6, 2025

Transition Impact Survey, Phase II: Updated Results

Replaces slides showing preliminary results at COGR's
June 2025 membership meeting

Survey Demographics

Transition Impact Survey, Phase II

Preliminary Results

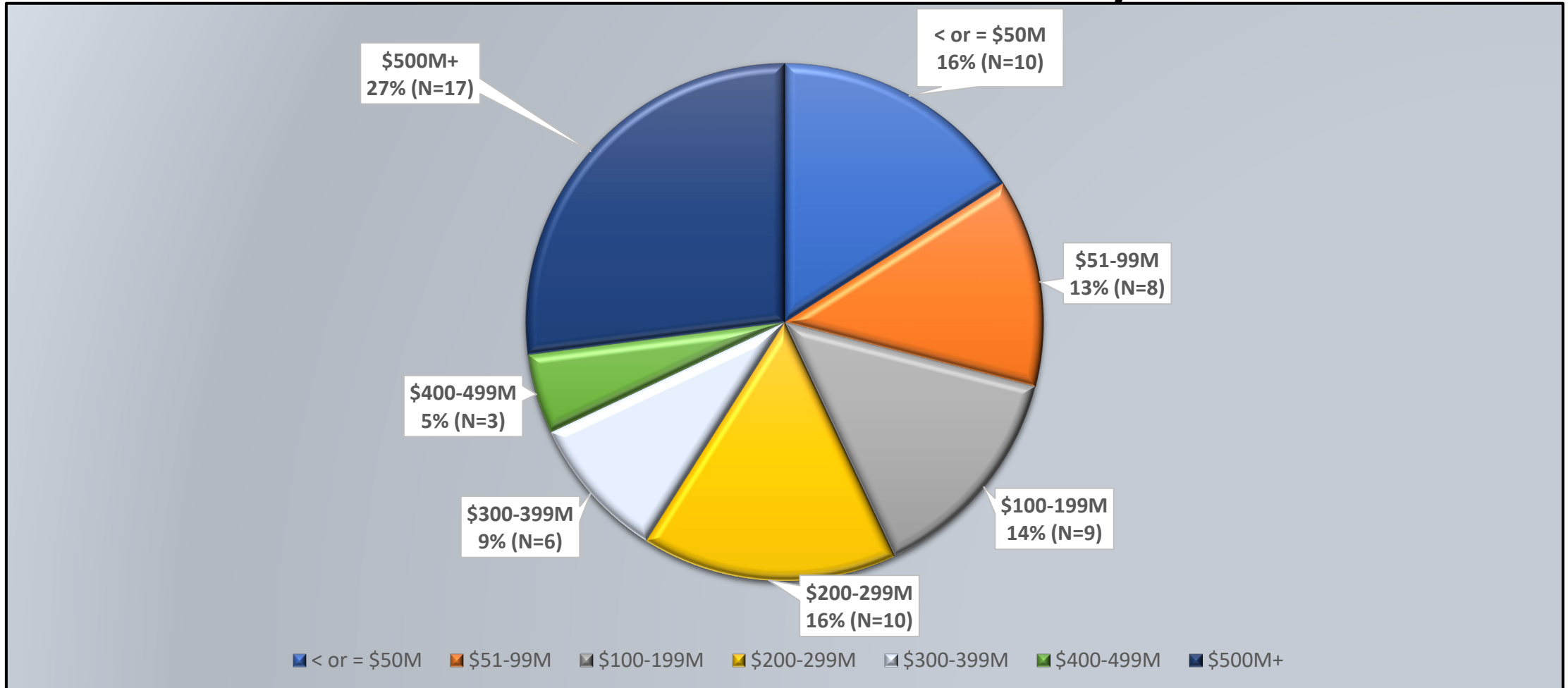
Number & Type of Responders for the Period May 20, 2025, to June 23, 2025



- **No. of Complete Responses:** 63
- **Types of Institutions that Responded:**
 - Public – 65% (N=41)
 - Private – 25% (N=16)
 - Affiliated Medical School – 24% (N=15)
- **Institutional Location:**
 - Northeast – 30% (N=19)
 - Southeast – 21% (N=13)
 - Midwest – 17% (N=11)
 - West – 22% (N=14)
 - Southwest – 9% (N=6)

Responders' Annual Federal R&D Expenditures #COGRJune25

Per 2023 NSF HERD Survey



Key Survey Themes

Transition Impact Survey, Phase II

Preliminary Results

Since Jan. 20, 2025, Nearly ALL Responders Received Time-Consuming Agency Request for Additional Information re. Payment Requests

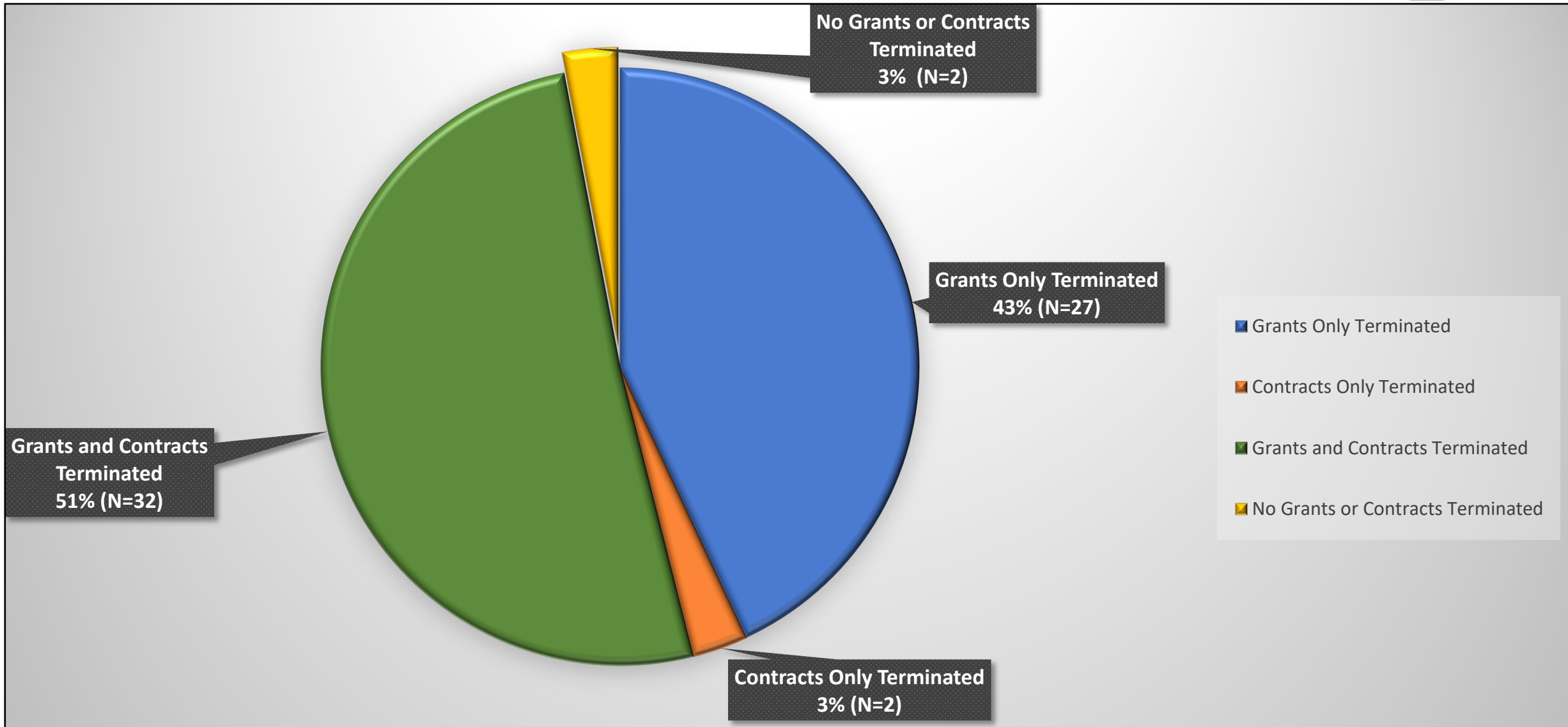
97% (N=60) of responders reported receiving a request from one or more federal agencies to provide additional information for a payment request on a grant or contract.

79% (N=50) of responders reported a payment was paused/rejected/not reimbursed “due to insufficient detailed justification” for payment.

Nearly 37% (N=21) of responder reported spending 15-45 hours responding to such requests and **28% (N=16) spent MORE than 45 hours in responding**

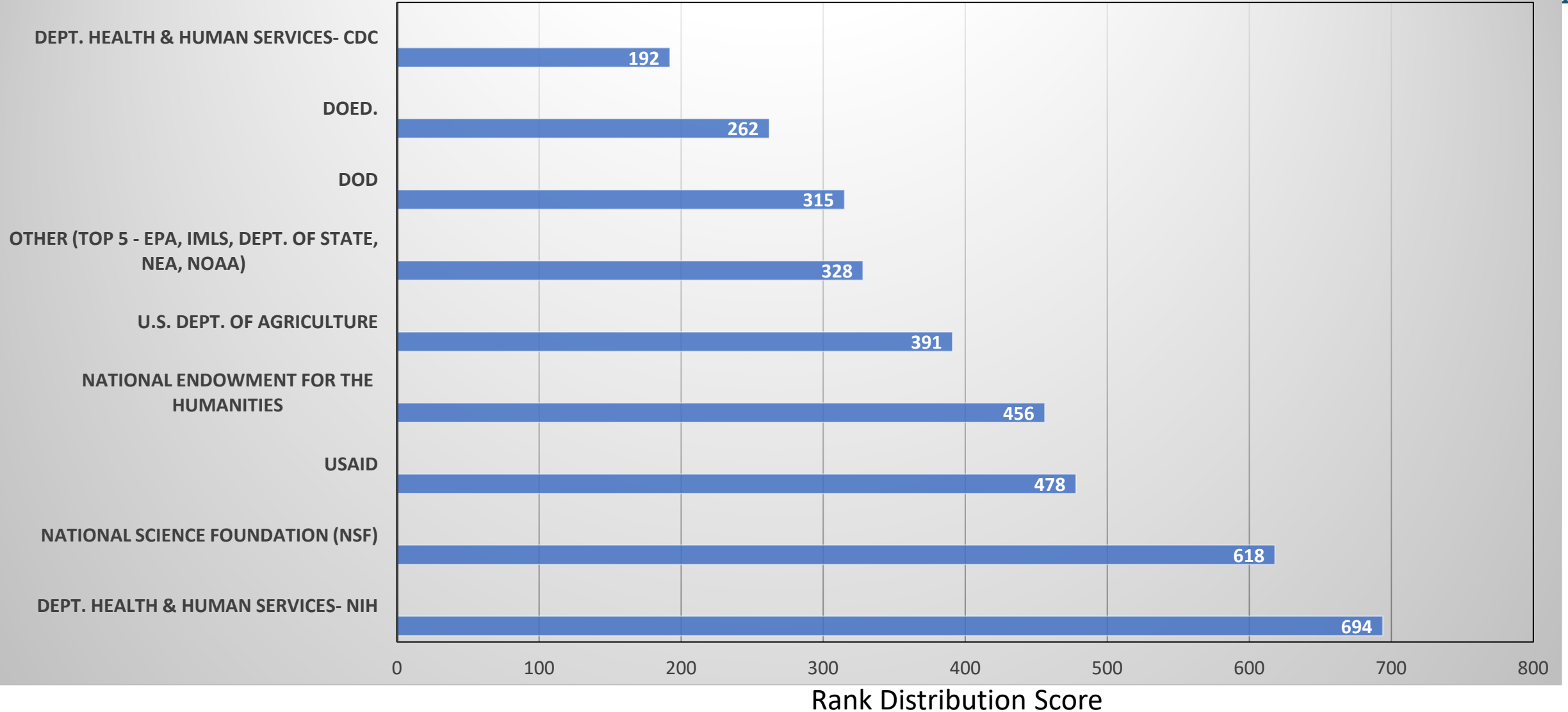
Virtually All Responders Had Grants and/or Contracts Terminated by the Government for Convenience

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NIH and NSF Led the Pack in Terminations

Top Ten Agencies that Terminated Grants and/or Contract



25

Terminations Have Had Extensive Financial Impact on Institutions

Over ½ of responders reported the government terminated for convenience 21 to over 50 grants.

57% of responders reported that the total balance remaining on terminated grants and contracts was more than \$5 Million.

85% of Responders Appealed/Objected to/Sought Waivers for Terminations

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No. of Appeals of Terminated Grants/Contracts

- Nearly 53% (N=27) of responders appealing 0-40% of terminations
- 48% (N=24) appealing 41-100% of terminations

Top 3 Agencies Where Appeals were/will be Filed

- HHS-NIH
- NSF
- NEH

Top Appeals Strategies

- 83% (N=42) - Providing justification for how award supports agency priorities
- 76% (N=39) - Challenging applicability of award term/termination
- 64% (N=33) - Eliminating problematic key words or elements

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15% Indirect Cost Rate: 91% of Responders report rate reduction will definitely or likely impact engagement in federally funded research

Anticipated Impacts:

- Increased efforts to seek other sources of funding – 83% (N=50)
- Reduction in administrative support for researchers – 80% (N=48)
- Reductions in workforce – 78% (N=47)
- Reduction in federal research portfolio – 77% (N=46)
- Reduction in facilities/infrastructure allotted to research – 68% (N=41)
- Reduction in post-docs – 65% (N=39)
- Reduction in graduate students – 63% (N=38)

Impacts of Terminations, Rate Reductions, and Other Recent Federal Research Funding Changes are Substantial

- 42% (N=25) of responders have implemented or planned to implement RIFS
- 35% (N=14) of responders noted “Other” Impacts:
 - Program and project terminations
 - Operational budget reductions/hiring freezes/travel restrictions
 - Fewer graduate students
- 20% (N=8) of responders reduced number of graduate students
- 15% (N=6) of responders reduced number of post-docs
- 15% (N=6) of responders reduced number of significant research programs
- 12% (N=5) of responders discontinued significant studies

More Detailed Data on Impacts

Transition Impact Survey, Phase II
Preliminary Results

Financial Impact of Grant/Contract Terminations

# of Grants and/or Contracts Involved	Balance Remaining on Terminated Contracts	Top 5 Terminating Agencies	Top Reasons for Termination (check all that apply)
1-5: 17% (10 responders)	\$50 -250K: 3% (2 responders)	HHS - NIH	Doesn't align with agency priorities 95% (57 responders)
6-10: 10% (6 responders)	\$251 – 500K: 7% (4 responders)	NSF	DEI/DEIA/GI 73% (44 responders)
11-20: 20% (12 responders)	\$501-999K: 2% (1 responder)	USAID	EOs Generally 55% (33 responders)
21-50: 25% (15 responders)	\$1 – 5M: 30% (18 responders)	NEH	Foreign Aid: 45% (27 responders)
50+: 28% (17 responders)	>\$5M: 57% (34 responders)	USDA	Covid-19 Funds: 38% (23 responders)

64% of responders (N = 31) USED institutional funds to continue the research supported by the terminated contracts

IMPACT OF CONTRACT/GRANT TERMINATIONS ON PERSONNEL

# Persons	PIs & Co-PIs	Students & Post-docs	Other Employees Directly Paid by Award
1-5	17% (N=10)	18% (N=9)	22% (N=11)
6-10	10% (N=6)	18% (N=9)	10% (N=5)
11-20	20% (N=1s)	18% (N=9)	16% (N=8)
21-50	22% (N=13)	23% (N=12)	20% (N=10)
50+	30% (N=18)	23% (N=12)	31% (N=15)

Anticipated Impacts of RIFS – 35 Total Responses

	% of Workforce Impacted	Research Workforce (No. of responders)	Administrative Workforce (No. of responders reporting)
1st	<5%	7	9
2nd	5-10%	8	6
	11-15%	0	2
3rd	16-25%>	3	3
	>25%	2	2

Next Steps

Transition Impact Survey, Phase II
Preliminary Results

Next Steps

- Survey to remain open until: June 23, 2025
- Full analysis will follow and posted on COGR website.



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Costing and Financial Compliance (CFC)

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Updates from REC Meetings with Federal Agency Representatives

- **Joint REC/RSIP Meeting with Jesse Watkins, Deputy Director, Security and Intelligence Directorate.** Jesse covered most of the key points in his presentation, but note:
 - DARPA expects PIs/co-PIs to disclose ALL patents or patent applications resulting from USG-funded research filed in a country of concern before the US. or filed on behalf of an FCOC entity. **COGR has asked DARPA to compare this requirement against current instructions in the Common Disclosure Form biosketch because those instructions do not require disclosure of ALL patents.**
- **REC meeting with Sheila Garrity, Director, Office of Research Integrity (ORI) and Loc Nguyen-Khoa, Deputy Director, ORI. Key points:**
 - Sample policy and procedures have been posted on [ORI website](#). Policy is a sample; institutions do not need to use the policy's exact language. ORI will review institutions' policies starting April 2026.
 - The recent EO "[Restoring Gold Standard Science](#)" is not anticipated to impact ORI's final research misconduct rule or the administration of research misconduct proceedings by ORI and/or institutions.
 - ORI plans to issue additional guidance on other topics including small institution guidance, implementation guidance, honest error, admissions, intent, pursuing leads, proceedings with multiple institutions and respondents, following leads, and conducting assessments.
 - ORI has is working to make its review of institutional reports more efficient, including a triage team to review reports quickly, and has closed out 150 cases in the first quarter of 2025.

Current REC Initiatives



- **Joint ARIO/COGR working groups** have been established to develop materials to support institutional compliance with the new research misconduct final regulation. Working groups include: (a) Checklist Group – 1st project is checklist for policy elements; (b) Decision Points Group – identification of items in the final rule where institutions must decide what route to take (e.g., RIO being permitted to conduct the inquiry); (c) Templates Group – 1st project is looking at development of/revision of templates for assessment, inquiry, and investigation.
 - Goal: Make tools available this summer as they are developed.
- **Update on DURC PEPP Policy** – REC director participated in joint association call with NIH re. status of DURC PEPP Policy in light of recent EO “Improving Safety and Security of Biological Research” which calls for a pause on “dangerous, gain-of-function research.” NIH is awaiting implementation guidance from OSTP, once this guidance is received, NIH will implement pause and develop new guidance. Institutions should review research portfolios now to identify research that meets the EO definition of “dangerous, gain-of-function research” and consider development of “pause” plans.
- **RFIs that REC is working on:**
 - DHHS RFI – “Ensuring Lawful Regulation and Unleashing Innovation to Make American (*sic*) Healthy Again,” [90 FR 20478](#), Comments Due 7/14/2025
 - EPA Proposed Rule – “Methylene Chloride; Regulation Under the Toxic Substances Control Act (TSCA); Compliance Date Extensions,” [90 FR 22214](#), Comments due 6/26/25
 - Also considering whether to comment on NIH Request for Information on Responsibly Developing and Sharing Generative Artificial Intelligence Tools Using NIH Controlled Access Data ([NOT-OD-25-118](#)) – comments due July 16, 2025



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